

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

E.K. and S.K., minors, by and through their parent and next friend LINDSEY KEELEY; O.H., S.H., and H.H., minors, by and through their parent and next friend, JESSICA HENNINGER; E.G., a minor, by and through his parent and next friend MEGAN JEBELES; E.Y. and C.Y. minors, by and through their parent and next friend ANNA YOUNG; L.K., L.K., and L.K., minors, by and through their parent and next friend ANNA KENKEL; and M.T., a minor, by and through her parent NATALIE TOLLEY,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE  
EDUCATION ACTIVITY; DR. BETH SCHIAVINO-NARVAEZ, in her official capacity as Director of the Department of Defense Education Activity; and PETER BRIAN HEGSETH, in his official capacity as Secretary of Defense,

Defendants.

Case No.

**INDEX OF EXHIBITS TO COMPLAINT**

**Ex. 1**, Exec. Order No. 14,168, 90 Fed. Reg. 8615, *Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>.

**Ex. 2**, Exec. Order No. 14,185, 90 Fed. Reg. 8763, *Restoring America's Fighting Force* (Jan. 27, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/restoring-americas-fighting-force/>.

- Ex. 3**, Exec. Order No. 14,190, 90 Fed. Reg. 8853, *Ending Radical Indoctrination in K-12 Schooling* (Jan. 29, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-indoctrination-in-k-12-schooling/>.
- Ex. 4**, Memorandum from Lori Pickel, DoDEA Acting Chief Academic Officer, to DoDEA administrators, educators, and staff (Feb. 5, 2025).
- Ex. 5**, Letter from Charles Kelker, DoDEA Europe Chief of Staff, to DoDEA Europe Administrators and School Level Employees (Feb. 7, 2025).
- Ex. 6**, Letter from Beth Schiavino-Narvaez, DoDEA Director, to DoDEA Sponsors, Parents, and Guardians (Feb. 10, 2025).
- Ex. 7**, Letter from Michelle Howard-Brahaney, DoDEA Europe Director for Student Excellence, to Parents and Students (Mar. 7, 2025).
- Ex. 8**, E-mail from Shawn Knudsen to Wiesbaden MS All Staff, Subject: AP Psychology Course Content Update (Feb. 7, 2025).
- Ex. 9**, Information Centers and Executive Orders, Examples, [https://rise.articulate.com/share/Co7fkmnPI6eyrWDe00At1Votq7bwAhcH#/lessons/fsi4yBCKusWPX\\_Tolm08NJhL4nTRoQke](https://rise.articulate.com/share/Co7fkmnPI6eyrWDe00At1Votq7bwAhcH#/lessons/fsi4yBCKusWPX_Tolm08NJhL4nTRoQke).
- Ex. 10**, Memorandum from Pete Hegseth, Secretary of Defense, U.S. Dep't of Defense, to Senior Pentagon Leadership, Commanders of the Combatant Commands, Defense Agency & DOD Field Activity Directors (Jan. 29, 2025).
- Ex. 11**, Memorandum from Lori Pickel, DoDEA Acting Chief Academic Officer, to DoDEA Administrators and School Level Employees (Feb. 5, 2025).
- Ex. 12**, E-mail on Behalf of the DoDEA Chief Academic Officer, to DoDEA Parents, Subject: AP Psychology Course Content Update (Mar. 3, 2025).
- Ex. 13**, Letter from Taylor York, DoDEA Civil Rights Analyst and Program Manager, to Jay M. Burcham, DoDEA Chief of Staff (Feb. 24, 2025).
- Ex. 14**, Letter from Taylor York, DoDEA Civil Rights Analyst and Program Manager, to Jay Burcham, DoDEA Chief of Staff (Feb. 13, 2025).